

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ASSOCIATED RECOVERY, LLC,
Plaintiff,

v.

LINDA BUTCHER, et. al.,
Defendants.

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Civil Action No. 2:16-cv-126-JRG-RSP

UNOPPOSED MOTION TO EXTEND DEADLINE

TO THE HONORABLE COURT:

COMES NOW, Plaintiff Associated Recovery, LLC, and would show the Court the following:

I.

On November 21, 2016, Defendant Alansis.com, Inc. filed their Motion to Dismiss or in the Alternative, Motion to Transfer (*see* Dkt. 119) and specifically joined in the Defendants' Consolidated Motion to Dismiss or, in the Alternative, Motion to Transfer (Dkt. 94) and Reply in Support of the Consolidated Motion (Dkt. 108). The current deadline for Plaintiff Associated Recovery, LLC to file its response to such motion is December 22, 2016.

II.

Plaintiff Associated Recovery, LLC is not prepared to file its response to Defendant Alansis.com, Inc.'s Motion to Dismiss or, in the Alternative, Motion to Transfer by the deadline, and needs an additional fifteen days to prepare and file such response. Accordingly, pursuant to

Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff Associated Recovery, LLC requests the Court to extend the deadline for Plaintiff Associated Recovery, LLC to file its response to Defendant Alansis.com, Inc.'s Motion to Dismiss or, in the Alternative, Motion to Transfer from December 22, 2016, to **January 6, 2017**.

III.

Good cause exists to extend the deadline for Plaintiff Associated Recovery, LLC to file its response to Defendant Alansis.com, Inc.'s Motion to Dismiss or, in the Alternative, Motion to Transfer. More specifically, due to the obligations of performing legal services with respect to other legal matters, and the "downtime" associated with the holiday season since the filing of Defendant Alansis.com, Inc.'s Motion to Dismiss or, in the Alternative, Motion to Transfer on November 21, 2016, counsel for Plaintiff Associated Recovery, LLC has been unable to prepare an adequate response to such motion. Moreover, Plaintiff Associated Recovery, LLC has recently retained other legal counsel to assist its undersigned counsel with the preparation of the response, and such other counsel needs time to adequately analyze the legal issues and prepare legal briefing regarding those issues.

IV.

Plaintiff Associated Recovery, LLC makes this request for extension not for delay only, but rather, so that it has adequate time to prepare and file a response to Defendant Alansis.com, Inc.'s Motion to Dismiss or, in the Alternative, Motion to Transfer that is beneficial to the Court. The granting of the extensions would delay neither the final pre-trial conference nor the trial.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Associated Recovery, LLC, respectfully requests the Honorable Court to extend the deadline for Plaintiff Associated Recovery, LLC to file its response to Defendant Alansis.com, Inc.'s Motion to Dismiss or, in the Alternative, Motion to Transfer from December 22, 2016, to **January 6, 2017**.

Respectfully submitted,

/s/ Luiz Felipe Oliveira
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

On the 22nd day of December, 2016, a true and correct copy of the foregoing document was electronically submitted to the Clerk of Court for the United States District Court for the Eastern District of Texas, using the ECF system. I hereby certify that I have served the lead counsel in charge for Defendant Alansis.com, Inc., Brian Casper, Esquire, and counsel of record for all other parties through the Court's electronic filing and service system in accordance with Local Rule CV-5.

CERTIFICATE OF CONFERENCE

On December 20, 2016, counsel has complied with the meet and confer requirement in Local Rule CV-7(h), and counsel for the respondent to this motion, Brian Casper, Esquire, counsel for Defendant Alansis.com, Inc., does not oppose the granting of the relief requested in this motion.

/s/ Luiz Felipe Oliveira
LUIZ FELIPE OLIVEIRA